

FILED BY YC D.C.
05 AUG 17 PM 1:40

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

FILED BY JSM D.C.
05 AUG 16 PM 3:03

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W.D. OF TENNESSEE
MANTH AND TREVANT,

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W.D. OF TENNESSEE
MEMPHIS

Plaintiff,

v.

Civil Action No. 05-2565 D/An.

ALLENBROOKE NURSING AND
REHABILITATION CENTER, LLC,

Defendant.

MOTION OF LYNLEE WELLS PALMER FOR ADMISSION *PRO HAC VICE*

Lynlee Wells Palmer, pursuant to Local Rule 83.1(b) and other applicable provisions of law, moves the Court to admit her specially for the purpose of acting as attorney for the Defendant, Allenbrooke Nursing and Rehabilitation Center, LLC, in this civil action, and states as follows:

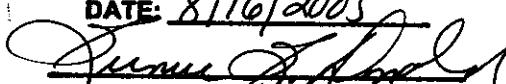
1. I am an attorney who is licensed to practice law in all courts of the State of Alabama, including the Supreme Court of Alabama. I was admitted to practice in Alabama in 2001; my Alabama State Bar Number is ASB-4367-T82P. I also am admitted to practice before the United States District Courts for the Northern, Middle, and Southern Districts of Alabama, and the United States Court of Appeals for the Eleventh Circuit.

2. I am an associate with the law firm of Johnston Barton Proctor & Powell LLP, 2900 AmSouth/Harbert Plaza, 1901 Sixth Avenue North, Birmingham, AL 35203, (205) 458-9400.

3. Attached hereto is a copy of my Certificate of Good Standing from the United States District Court for the Northern District of Alabama.

MOTION GRANTED

DATE: 8/16/2005


BERNICE BOUIE DONALD
U.S. DISTRICT JUDGE

(7)

4. I certify that I have obtained and am familiar with the local rules of this Court, including the Guidelines of Professional Courtesy and Conduct.

5. I certify that I am in good standing in all courts in which I am admitted to practice, and further certify that I have not been disciplined at any time by any court before which I have practiced.

6. John J. Heflin, III and John Marshall Jones of Bourland, Heflin, Alvarez & Minor, PLC, 5400 Poplar Avenue, Suite 100, Memphis, TN 38119, (901) 683-3526, will serve as local counsel for the Defendant, Allenbrooke Nursing and Rehabilitation Center, LLC.

7. Counsel for the Plaintiff has no objection to the relief requested herein. *See* accompanying Certificate of Counsel.

8. A proposed Order granting the Motion is submitted herewith.

WHEREFORE, Lynlee Wells Palmer respectfully requests that the Court admit her specially for the purpose of representing the Defendant in this civil action.



LYNLEE WELLS PALMER
State Bar No. ASB-4367-T82P

JOHNSTON BARTON PROCTOR & POWELL LLP
2900 AmSouth/Harbert Plaza
1901 Sixth Avenue North
Birmingham, AL 35203
(205) 458-9400

JOHN J. HEFLIN, III
Tennessee Disciplinary No. 6142
JOHN MARSHALL JONES
Tennessee Disciplinary No. 13289

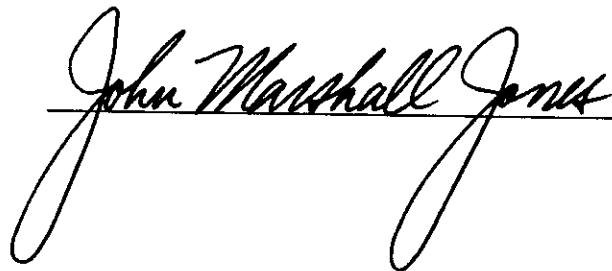
Attorneys for Defendant

BOURLAND, HEFLIN, ALVAREZ & MINOR, PLC
5400 Poplar Avenue, Suite 100
Memphis, TN 38119
(901) 683-3526

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served on the following person by first class United States mail, postage prepaid, this 16th day of August, 2005:

James D. Harper, Esq.
Stroud, Harper & Whitwell, PC
5779 Getwell Road
Building C, Suite 1
Southaven, MS 38672

A handwritten signature in black ink, appearing to read "John Marshall Jones", is written over a horizontal line. The signature is fluid and cursive, with a large, stylized "J" at the beginning.

UNITED STATES DISTRICT COURT
Northern District of Alabama
Office of the Clerk
Room 140, 1729 5th Avenue North
Birmingham, Alabama 35203
(205) 278-1700

Perry Mathis
Clerk

Sharon Harris
Chief Deputy Clerk

CERTIFICATE OF GOOD STANDING

I, **Perry D. Mathis**, Clerk of the United States District Court, Northern District of Alabama,

DO HEREBY CERTIFY that **LYNLEE WELLS PALMER** was duly admitted to practice in said Court on **October 25, 2001**, and is in good standing as a member of the bar of said Court.

Dated at Birmingham, Alabama, on August 2, 2005.

PERRY D. MATHIS, CLERK

By:

Stacy Hanley
Deputy Clerk



Notice of Distribution

This notice confirms a copy of the document docketed as number 7 in case 2:05-CV-02565 was distributed by fax, mail, or direct printing on August 18, 2005 to the parties listed.

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Honorable Bernice Donald
US DISTRICT COURT